

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE GENERAL CONVENTION OF THE NEW
JERUSALEM IN THE UNITED STATES OF
AMERICA, INC., THE MASSACHUSETTS
ASSOCIATION OF THE NEW JERUSALEM
(SWEDENBORGIAN), and GEORGE CHAPIN,

Plaintiffs,

C.A. No.

v.

EDWARD MACKENZIE, THOMAS KENNEDY,
BOSTON SOCIETY OF THE NEW JERUSALEM,
INCORPORATED (SWEDENBORGIAN), and
BOSTONVIEW CORPORATION,

Defendants.

04 CV 10399 WGY

MOTION FOR A MEMORANDUM OF LIS PENDENS

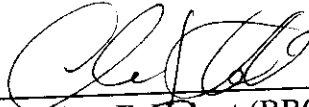
Plaintiff, The General Convention of the New Jerusalem in the United States of America, Inc. (the "Denomination"), hereby moves pursuant to Mass. Gen. Laws ch. 184, § 15 for an order of approval of a Memorandum of Lis Pendens to be recorded against the real property known as 140 Bowdoin Street, Boston, Massachusetts. As grounds therefor, the disaffiliation by Boston Society of the New Jerusalem Incorporated (Swedenborgian) (the "Church") from the Denomination entitles the Denomination to the property pursuant to the Church's by-laws. Plaintiffs rely on the supporting memorandum which is filed herewith.

WHEREFORE, Plaintiffs request that this Court allow their Motion for a Memorandum of Lis Pendens and approve the Memorandum which is attached hereto.

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By their attorneys,

HOLLAND & KNIGHT LLP



Geoffrey E. Hobart (BBO No. 547499)
Christopher J. Trombetta (BBO No. 556923)
10 St. James Avenue
Boston, MA 02116
(617) 523-2700

Dated: February 27, 2004